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16 UNITED STATES DISTRICT COURT  
17 SOUTHERN DISTRICT OF CALIFORNIA

18 In re GROUPON MARKETING AND SALES )  
19 PRACTICES LITIGATION )

No.  
3:11-md-02238-DMS-RBB

20 DECLARATION OF PLAINTIFF ASHLEY  
21 CHRISTENSEN IN SUPPORT OF MOTION  
22 FOR FINAL APPROVAL

23 JUDGE: Honorable Dana M. Sabraw  
24 DATE: September 7, 2012  
25 TIME: 1:30 p.m.  
26 CTRM: 10  
27  
28

1 I, Ashley Christensen, declare:

2 1. I am a plaintiff in the above-referenced matter. I have personal knowledge of the  
3 facts set forth herein and, if called as a witness, could and would testify competently thereto.

4 2. I am a resident of the state of Minnesota.

5 3. On or around May 27, 2010, I received a "Daily Deal" email offer from Groupon  
6 for "groupon" vouchers redeemable at Wheel Fun Rentals.

7 4. According to the "Daily Deal" offer, I would pay \$15.00 to Groupon in exchange  
8 for a groupon voucher redeemable for \$34.00 worth of rentals at any Wheel Fun Rentals  
9 location.

10 5. I purchased two groupon vouchers for Wheel Fun Rentals and made payment of  
11 \$30.00 to Groupon through Groupon's website.

12 6. I subsequently received an email from Groupon confirming my purchase of two  
13 groupon vouchers for Wheel Fun Rentals.

14 7. Each groupon voucher had an expiration date of October 15, 2010.

15 8. I was unable to redeem the Wheel Fund Rentals groupon vouchers before the  
16 expiration period imposed by Groupon.

17 9. After October 15, 2010, I contacted Groupon to obtain a refund for the value of  
18 the groupon vouchers.

19 10. A Groupon representative told me that Groupon would not refund my money.

20 11. I never received a refund from Groupon for my expired groupon vouchers.

21 12. I never received a refund from Wheel Fun Rentals for my expired groupon  
22 vouchers.

23 I declare under penalty of perjury under the laws of the United States of America that  
24 the foregoing is true and correct. Executed this 24<sup>th</sup> day of August, 2012, at Minneapolis,  
25 Minnesota.

26   
27 \_\_\_\_\_  
28 ASHLEY CHRISTENSEN

CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 24, 2012.

s/ John J. Stoia, Jr.  
JOHN J. STOIA, JR.

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